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E-File: October 16, 2009

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15 Attorneys for Debtors and  
 16 Debtors in Possession

17 **UNITED STATES BANKRUPTCY COURT**  
 18 **DISTRICT OF NEVADA**

19 In re:

20 Case No.: BK-S-09-14814-LBR  
 21 (Jointly Administered)

22 Chapter 11

23 THE RHODES COMPANIES, LLC, aka  
 24 "Rhodes Homes, et al.<sup>1</sup>"  
 25 Debtors.

26 Affects:

27  All Debtors  
 28  Affects the following Debtor(s):

29 The Rhodes Companies, LLC 09-14814  
 30 LBR; Tuscany Golf Country Club, LLC  
 31 09-14884

32 Hearing Date: November 16, 2009

33 Hearing Time: 9:30 a.m.

34 Courtroom 1

35 \_\_\_\_\_  
 36 <sup>1</sup> The Debtors in these cases, along with their case numbers are: Heritage Land Company, LLC (Case No. 09-  
 37 14778); The Rhodes Companies, LLC (Case No. 09-14814); Tribes Holdings, LLC (Case No. 09-14817); Apache  
 38 Framing, LLC (Case No. 09-14818); Geronimo Plumbing LLC (Case No. 09-14820); Gung-Ho Concrete LLC (Case  
 39 No. 09-14822); Bravo, Inc. (Case No. 09-14825); Elkhorn Partners, A Nevada Limited Partnership (Case No. 09-  
 40 14828); Six Feathers Holdings, LLC (Case No. 09-14833); Elkhorn Investments, Inc. (Case No. 09-14837); Jarupa,  
 41 LLC (Case No. 09-14839); Rhodes Realty, Inc. (Case No. 09-14841); C & J Holdings, Inc. (Case No. 09-14843);  
 42 Rhodes Ranch General Partnership (Case No. 09-14844); Rhodes Design and Development Corporation (Case No.

1                   **DEBTORS' THIRD OMNIBUS OBJECTION TO CLAIMS PURSUANT TO SECTION**  
 2                   **502(b) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 3003 AND 3007**  
 3                   **[INSUFFICIENT DOCUMENTATION CLAIMS]; DECLARATION OF PAUL D.**  
 4                   **HYUGENS IN SUPPORT THEREOF**

5                   The above-captioned debtors and debtors in possession (collectively, the “Debtors”)  
 6                   hereby object (the “Third Omnibus Objection”) to each of the claims (the “Insufficient  
 7                   Documentation Claims”) attached hereto as **Exhibit A**. The Debtors are objecting pursuant to  
 8                   section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 3003 and  
 9                   3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and request the  
 10                  entry of an order (the “Order”) disallowing and expunging in full each of the Insufficient  
 11                  Documentation Claims.<sup>2</sup> In support of this Third Omnibus Objection, the Debtors rely on the  
 12                  *Declaration of Paul D. Huygens in Support of Debtors' Third Omnibus Objection to Claims*  
 13                  *Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rules 3003 and 3007*  
 14                  *[Insufficient Documentation Claims]*, attached hereto. In further support of this Third Omnibus  
 15                  Objection, the Debtors respectfully represent as follows:

16                   **BACKGROUND**

17                  1. On March 31, 2009, the above-captioned Debtors (the “Primary Filers”) except  
 18                  Tuscany Golf Country Club, LLC, Pinnacle Grading, LLC, and Rhodes Homes Arizona, LLC  
 19                  (the “Secondary Filers”) filed voluntary petitions for relief under chapter 11 of title 11 of the  
 20                  Bankruptcy Code. On April 1, 2009, the Secondary Filers filed voluntary petitions for relief  
 21                  under chapter 11 of the Bankruptcy Code. All references to Petition Date herein shall mean  
 22                  March 31, 2009 for the Primary Filers or April 1, 2009 for the Secondary Filers, as applicable.

23  
 24                  09-14846); Parcel 20, LLC (Case No. 09-14848); Tuscany Acquisitions IV, LLC (Case No. 09-14849); Tuscany  
 25                  Acquisitions III, LLC (Case No. 09-14850); Tuscany Acquisitions II, LLC (Case No. 09-14852); Tuscany  
 26                  Acquisitions, LLC (Case No. 09-14853); Rhodes Ranch Golf Country Club, LLC (Case No. 09-14854); Overflow,  
 27                  LP (Case No. 09-14856); Wallboard, LP (Case No. 09-14858); Jackknife, LP (Case No. 09-14860); Batcave, LP  
 28                  (Case No. 09-14861); Chalkline, LP (Case No. 09-14862); Glynda, LP (Case No. 09-14865); Tick, LP (Case No.  
 29                  09-14866); Rhodes Arizona Properties, LLC (Case No. 09-14868); Rhodes Homes Arizona, L.L.C. (Case No. 09-  
 30                  14882); Tuscany Golf Country Club, LLC (Case No. 09-14884); and Pinnacle Grading, LLC (Case No. 09-14887).

2                  The Debtors reserve the right to file additional omnibus objections, whether on substantive or non-substantive  
 grounds, to any and all other claims filed against their estates.

1 The Debtors are continuing in possession of their property and are operating and managing their  
2 businesses, as debtors in possession, pursuant to sections 1107 and 1108 of the Bankruptcy  
3 Code.

4 2. The Debtors object to each of the following Insufficient Documentation Claims,  
5 true and correct copies of which are attached hereto as **Exhibit A**:

- 6 • Claim No. 37, filed by Evelia Delayo (the “Delayo Claim”) in Case No. 09-14814  
7 against The Rhodes Companies, LLC, in the amount of \$3,000;
- 8 • Claim No. 8, filed by HSBC Bank Nevada, N.A. (the “HSBC Claim”) in Case No.  
9 09-14884 against Tuscany Golf Country Club, LLC in the amount of \$291.52;
- 10 • Claim No. 10, filed by Recovery Management Systems Corporation (the  
11 “Recovery Management Claim”) in Case No. 09-14884 against Tuscany Golf  
12 Country Club, LLC in the amount of \$32,621.67; and
- 13 • Claim No. 35, filed by Verizon Wireless (the “Verizon Claim”) in Case No. 09-  
14814 against The Rhodes Companies, LLC in the amount of \$8,038.60.

14 3. With respect to the Delayo Claim, claimant failed to attach any documentation  
15 supporting its claim. The Debtors are unable to locate any records pertaining to the claim based  
16 on the information provided on the claim, and therefore are unable to determine the validity of  
17 the Delayo Claim. On September 16, 2009, the Debtors sent claimant a letter requesting the  
18 withdrawal of the claim, a true and correct copy of which is attached hereto as **Exhibit B**. As of  
19 this date, the Debtors have not received any response or documentation supporting the Delayo  
20 Claim.

21 4. With respect to the HSBC Claim, claimant failed to attach any documentation  
22 supporting its claim. The Debtors are unable to locate any records pertaining to the claim based  
23 on the information provided in the claim, and therefore are unable to determine the validity of  
24 the HSBC Claim. On September 18, 2009, the Debtors sent claimant a letter requesting  
25 additional information regarding the claim, a true and correct copy of which is attached hereto as  
26 **Exhibit C**. As of this date, the Debtors have not received any response or documentation  
27 supporting the HSBC Claim.

LARSON & STEPHENS  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
Tel: (702) 382-1170 Fax: (702) 382-1169

5. With respect to the Recovery Management Claim, the supporting documentation attached to the claim is insufficient for the Debtors to determine the validity of the claim. On September 18, 2009, the Debtors sent claimant a letter requesting additional information regarding the claim, a true and correct copy of which is attached hereto as **Exhibit D**. As of this date, the Debtors have not received any response or documentation supporting the Recovery Management Claim.

6. With respect to the Verizon Claim, the supporting documentation attached to the claim is insufficient for the Debtors to determine the validity of the claim. On September 18, 2009, the Debtors sent claimant a letter requesting additional information regarding the claim, a true and correct copy of which is attached hereto as **Exhibit E**. As of this date, the Debtors have not received any response or documentation supporting the Verizon Claim.

**RELIEF REQUESTED**

7. By this Third Omnibus Objection, the Debtors seek entry of an order, pursuant to section 502(b) of the Bankruptcy Code and Bankruptcy Rules 3003 and 3007, disallowing and expunging in full each of the disputed Insufficient Documentation Claims.

## **OBJECTION**

8. Bankruptcy Rule 3007(d) provides that the Debtors may submit objections to more than one claim in an “omnibus” format if the claims were presented in a form that does not comply with applicable rules, and that the objector is unable to determine the validity of the claim because of the noncompliance. The disputed claims do not provide sufficient documentation for the Debtors to determine the validity of the claims. For the reasons set forth herein, the Insufficient Documentation Claims are not valid claims against the Debtors.

9. Bankruptcy Code section 502 authorizes a party in interest to object to claims. See 11 U.S.C. §502(a). Although a proper proof of claim is presumed valid under Bankruptcy Rule 3001(f), once an objection controverts the presumption, the creditor has the ultimate burden of persuasion as to the validity and amount of the claim. *Ashford v. Consolidated Pioneer Mortg.* (*In re Consolidated Pioneer Mortg.*), 178 B.R. 222, 226 (B.A.P. 9th Cir. 1995), *aff'd*, 91 F.3d 151 (9th Cir. 1996) (quoting *In re Allegheny International, Inc.*, 954 F.2d 167, 173-74 (3d

Cir. 1992)). The Bankruptcy Appellate Panel for the Ninth Circuit explained the shifting burdens of proof with respect to objection to proofs of claim as follows:

The burden of proof for claims brought in the bankruptcy court under 11 U.S.C.A. § 502(a) rests on different parties at different times. Initially, the claimant must allege facts sufficient to support the claim. If the averments in his filed claim meet this standard of sufficiency, it is “prima facie” valid. In other words, a claim that alleges facts sufficient to support a legal liability to the claimant satisfies the claimant’s initial obligation to go forward. . . . The burden of persuasion is always on the claimant.

*Id.* (emphasis added). Following this decision, the District Court for the Northern District of California emphasized, “unless the claimant has alleged ‘facts sufficient to support a legal liability, ‘the claim is not *prima facie* valid.’” *In re Hongnisto*, 293 B.R. 45, 50 (N.D. Cal. 2003) (quoting *Consolidated Pioneer Mortg.*, 178 B.R. at 266) (holding that the claimant’s proof of claim failed to allege sufficient facts to support a legal liability and consequently disallowed the proof of claim); *see Consolidated Pioneer Mortg.*, 178 B.R. at 227 (holding that because the proof of claim did not allege sufficient facts to support the claim, the proof of claim was disallowed).

10. Based on the Debtors' review of their books and records and the disputed claims, the claimants have no valid legal justification for asserting the filed Insufficient Documentation Claims. As a result, the Debtors submit that the Insufficient Documentation Claims should be expunged and disallowed in their entirety.

## CONCLUSION

11. The Debtors object to the allowance of the Insufficient Documentation Claims for the reasons stated herein, and the Debtors hereby move this Court for an Order disallowing and expunging in full each of the Insufficient Documentation Claims.

## NOTICE

12. Notice of this objection has been provided to (i) the Office of the United States Trustee, (ii) counsel to the Creditors' Committee, (iii) each holder of an Insufficient Documentation Claim to which the Debtors are objecting in this Third Omnibus Objection in accordance with the addresses provided in the proofs of claim for such Insufficient Documentation Claims, (iv) each person or entity that has filed a notice of appearance and request for special notice, and (v) other required parties pursuant to the Court's case management order entered in these cases. The Debtors submit that in light of the nature of the relief requested herein, no other or further notice is required.

13. Pursuant to Bankruptcy Rule 3007, the Debtors have provided all claimants affected by the Third Omnibus Objection with at least thirty (30) days' notice of the hearing on the Omnibus Objection.

WHEREFORE, the Debtors respectfully request that the Court enter an Order, substantially in the form attached hereto as **Exhibit F**, disallowing and expunging the Insufficient Documentation Claims, and granting such other and further relief as the Court deems just and proper.

**DATED** this 16<sup>th</sup> day of October, 2009.

## LARSON & STEPHENS

/s/ Zachariah Larson, Esq.  
Zachariah Larson, Bar No. 7787  
Kyle O. Stephens, Bar No. 7928  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, NV 89101  
702/382-1170  
Attorneys for Debtors and Debtors in  
Possession

**DECLARATION OF PAUL D. HUYGENS IN SUPPORT OF THIRD OMNIBUS  
OBJECTION**

I, Paul D. Huygens, declare as follows:

1. I am the Senior Vice President of Special Projects of the above-captioned debtors and debtors in possession (the “Debtors”). The facts set forth in this Declaration are personally known to me and, if called as a witness, I could and would testify thereto.

2. This declaration is submitted in support of the *Debtors' Third Omnibus Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rules 3003 and 3007[Insufficient Documentation Claims]* (the "Third Omnibus Objection").

3. I am one of the persons responsible for overseeing the claims reconciliation and objection process in the Debtors' chapter 11 cases. I have read the Debtors' Third Omnibus Objection and am directly, or by and through my personnel or agents, familiar with the information contained therein.

4. The claims and attached information and documentation were carefully reviewed and analyzed in good faith, and the Debtors' books and records were referenced for additional support, utilizing due diligence by appropriate personnel of the Debtors. These efforts have resulted in the identification of the disputed "Insufficient Documentation Claims", as identified in the Third Omnibus Objection. I have personally reviewed each of the Insufficient Documentation Claims.

5. To the best of my knowledge, information and belief, the claims listed in the Third Omnibus Objection, copies of which are attached hereto as **Exhibit A**, are not valid claims against the Debtors. As a result, I believe that these the Insufficient Documentation Claims should be disallowed and expunged by the Court.

6. With respect to the Delayo Claim, claimant failed to attach any documentation supporting its claim. The Debtors are unable to locate any records pertaining to the claim based on the information provided on the claim, and therefore are unable to determine the validity of the Delayo Claim. On September 16, 2009, the Debtors sent claimant a letter requesting that claimant withdraw the claim, a true and correct copy of which is attached hereto

as **Exhibit B**. As of this date, the Debtors have not received any response or documentation supporting the Delayo Claim.

7. With respect to the HSBC Claim, claimant failed to attach any documentation supporting its claim. The Debtors are unable to locate any records pertaining to the claim based on the information provided on the claim, and therefore are unable to determine the validity of the HSBC Claim. On September 18, 2009, the Debtors sent claimant a letter requesting additional information regarding the claim, a true and correct copy of which is attached hereto as **Exhibit C**. As of this date, the Debtors have not received any response or documentation supporting the HSBC Claim.

8. With respect to the Recovery Management Claim, the supporting documentation attached to the claim is insufficient for the Debtors to determine the validity of the claim. On September 18, 2009, the Debtors sent claimant a letter requesting additional information regarding the claim, a true and correct copy of which is attached hereto as **Exhibit D**. As of this date, the Debtors have not received any response or documentation supporting the Recovery Management Claim.

9. With respect to the Verizon Claim, the supporting documentation attached to the claim is insufficient for the Debtors to determine the validity of the claim. On September 18, 2009, the Debtors sent claimant a letter requesting additional information regarding the claim, a true and correct copy of which is attached hereto as **Exhibit E**. As of this date, the Debtors have not received any response or documentation supporting the Verizon Claim.

10. I believe that granting the relief requested in the Third Omnibus Objection is in the best interests of the Debtors, their estates and their creditors.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 16<sup>th</sup> day of October, 2009, at Las Vegas, Nevada.

/s/ *Paul D. Huygens*

Paul D. Huygens

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# EXHIBIT A

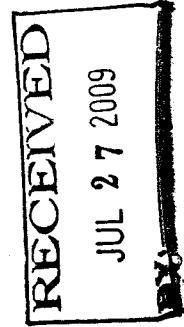
LARSON & STEPHENS  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
Tel: (702) 382-1170 Fax: (702) 382-1169

UNITED STATES BANKRUPTCY COURT		PROOF OF CLAIM
Name of Debtor: <b>THE RHODES COMPANIES LLC</b>		Case Number: <b>09-14814</b>
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): <b>EVELIA DELAYO</b>		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim.
Name and address where notices should be sent: <b>HERRITAGE Land Company, LLC c/o Omni Management Group, LLC 16161 Ventura Blvd, suite Suite C Telephone number: PMB 477 866-989-6144 Encino, CA 91436</b>		Court Claim Number: <b>14814</b> (If known)
Name and address where payment should be sent (if different from above): <b>Evelia Delayo 1044 Via Canale Dr Henderson, Nevada 89011 Telephone number: (702) 564-0995 or cell# (949) 285-1440</b>		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.
1. Amount of Claim as of Date Case Filed: <b>\$ 3,000.00</b>		<input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4.		
If all or part of your claim is entitled to priority, complete item 5.		
<input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges.		
2. Basis for Claim: <b>Construction Defect (Master Bedroom) loose florboards</b> (See instruction #2 on reverse side.)		
3. Last four digits of any number by which creditor identifies debtor: <b>-14814</b>		
3a. Debtor may have scheduled account as: <b>Chapter 11 bankruptcy</b> (See instruction #3a on reverse side.)		
4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information.		
Nature of property or right of setoff: <input checked="" type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input checked="" type="checkbox"/> Other Describe: <b>paid cash, no lean involved</b>		
Value of Property: <b>\$ 445,000.00</b> Annual Interest Rate <b>%</b>		
Amount of arrearage and other charges as of time case filed included in secured claim,		
If any: <b>\$</b> Basis for perfection: _____		
Amount of Secured Claim: <b>\$ 3,000.00</b> Amount Unsecured: <b>\$</b>		
6. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim.		
7. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.)		
DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.		
If the documents are not available, please explain:		
Date: <b>7-20-09</b>	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.	
		FOR COURT USE ONLY



Evelia Delayo  
1044 Via Canale Dr  
Henderson Nevada 89011

Heritage Land Company, LLC  
c/o Omni Management Group, LLC  
16161 Ventura Blvd, Suite C  
PMB 477  
Encino, CA 91436



§ 1435+2323

§ 1435+2323

UNITED STATES BANKRUPTCY COURT _____		DISTRICT OF NEVADA	PROOF OF CLAIM
Name of Debtor: Tuscany Golf Club LLC		Case Number: 09-14884-LBR	
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.			
Name of Creditor (the person or other entity to whom the debtor owes money or property): HSBC Bank Nevada, N.A.(OFFICEMAX COMM)		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. <b>Court Claim Number:</b> _____ <i>(If known)</i> Filed on: _____	
Name and address where notices should be sent:  HSBC Bank Nevada, N.A. eCAST Settlement Corporation c/o Bass & Associates, P.C. 3936 E. Ft. Lowell Road, Suite #200 Tucson, AZ 85712 Telephone number: (520) 577 - 1544		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.	
Name and address where payment should be sent (if different from above):  Bass & Associates, P.C. 3936 E. Ft. Lowell Suite 200 Tucson, AZ 85712  Telephone number: (520) 577 - 1544		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.	
<b>1. Amount of Claim as of Date Case Filed:</b> \$ 291.52  If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4.  If all or part of your claim is entitled to priority, complete item 5.		<b>5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount.</b>  Specify the priority of the claim.	
<b>2. Basis for Claim:</b> Goods Sold (See instruction #2 on reverse side.)		<input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B).	
<b>3. Last four digits of any number by which creditor identifies debtor:</b> *****1200  <b>3a. Debtor may have scheduled account as:</b> Officemax Comm (See instruction #3a on reverse side.)		<input type="checkbox"/> Wages, salaries, or commissions (up to \$10,950*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier – 11 U.S.C. §507 (a)(4).	
<b>4. Secured Claim</b> (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information.		<input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. §507 (a)(5).	
<b>Nature of property or right of setoff:</b> <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe:  <b>Value of Property:</b> \$ _____ <b>Annual Interest Rate:</b> %  <b>Amount of arrearage and other charges as of time case filed included in secured claim,</b> if any: \$ _____ <b>Basis for perfection:</b> _____		<input type="checkbox"/> Up to \$2,425* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. §507 (a)(7).	
<b>Amount of Secured Claim:</b> \$ _____ <b>Amount Unsecured:</b> \$ 291.52		<input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. §507 (a)(8).	
<b>6. Credits:</b> The amount of all payments on this claim has been credited for the purpose of making this proof of claim.		<input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. §507 (a)(____).	
<b>7. Documents:</b> Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements or running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.)		<b>Amount entitled to priority:</b> \$ _____	
DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.  If the documents are not available, please explain:			
Date: 07/24/2009	<b>Signature:</b> The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.		FOR COURT USE ONLY
/s/ Jose Segura      Jose Segura, Administrative Assistant			

## B10 (Official Form 10) (12/08)

United States Bankruptcy Court District of Nevada, Las Vegas Division		PROOF OF CLAIM
Name of Debtor: TUSCAN GOLF COUNTRY CLUB LLC XXX-XX-7132		Case Number: 09-14884-lbr
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.		
Name of Creditor (the person or other entity to whom the debtor owes money or property): GE Money Bank dba LESCO		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim.
Name and address where notices should be sent: <b>Recovery Management Systems Corporation</b> For GE Money Bank 1616883 - 5874888 25 SE 2nd Ave Ste 1120 Miami, FL 33131		Court Claim Number: _____ (If known)
Telephone number: (305) 379-7674		Filed on: _____
Name and address where the payment should be sent (if different from above):		<input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.
Telephone number:		<input type="checkbox"/> Check box if you are the debtor or trustee in this case.
<b>1. Amount of Claim as of Date Case Filed:</b> <u>\$32,621.67</u>		<b>5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount.</b>
If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4.		Specify the priority of the claim:
If all or part of your claim is entitled to priority, complete item 5.		<input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).
<input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of interest or charges.		<input type="checkbox"/> Wages, salaries, or commissions (up to \$10,950*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4).
<b>2. Basis for Claim:</b> <u>Goods sold: Revolving Credit Line</u> (See instruction #2 on reverse side.)		<input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5).
<b>3. Last four digits of any number by which creditor identifies debtor:</b> 1973		<input type="checkbox"/> Up to \$2,425* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7).
3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		<input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8).
<b>4. Secured Claim</b> (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information.		<input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____).
<b>Nature of property or right of setoff:</b> <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other		<b>Amount entitled to priority:</b> \$ _____
Describe:		
Value of Property: _____ Annual Interest Rate ____%		
Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____		
Amount of Secured Claim: <u>\$0.00</u> Amount Unsecured <u>\$32,621.67</u>		
<b>6. Credits:</b> The amount of all payments on this claim has been credited for the purpose of making this proof of claim.		
<b>7. Documents:</b> Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements or running accounts, contracts, judgments, mortgages and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.)		
DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.		
If the documents are no available, please, explain:		
Date: August 6, 2009	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.	FOR COURT USE ONLY
/s/ Ramesh Singh Ramesh Singh, Recovery Management Systems Corporation		

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

\*Amounts are subject to adjustment on 4/1/10 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.

DEBTOR(S):

TUSCANY GOLF COUNTRY CLUB LLC  
XXX-XX-7132  
901 OLIVIA PARKWAY  
HENDERSON NV 89015

OBLIGOR(S):

TUSCANY GOLF COUNTRY CLUB LLC

BANKRUPTCY NUMBER: 09-14884-lbr

FILING DATE: 4/1/2009

CHAPTER: 11

Recovery Management Systems Corporation  
For GE Money Bank  
25 SE 2nd Ave Ste 1120  
Miami, FL 33131

ACCOUNT SUMMARY

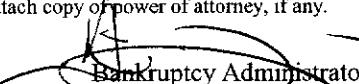
Account Number: 1973

Account Type: Credit Card

Balance at Bankruptcy Filing Date: \$32,621.67

Pursuant to paragraph 9 Official Bankruptcy Form 10, Proof of Claim, in lieu of attaching account documents, a summary of the account, compiled from the information contained in the account databases of GE Money Bank / LESCO and their agents, if any, is provided. (See Instructions to Official Form 10). This debt arises from the use of a credit / charge card account or other money loaned, the supporting documents for which were provided by GE Money Bank / LESCO to the debtor pre-petition. For further information about this claim call (305) 379-7674 and ask to speak to the Claims Servicing Supervisor. Some documents may no longer be available.

## RECEIVED &amp; FILED

UNITED STATES BANKRUPTCY COURT		District Of Nv	PROOF OF CLAIM
Name of Debtor: The Rhodes Companies, Llc		09 JUL 27 P1 09	Case Number: 09-14814
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.			
Name of Creditor (the person or other entity to whom the debtor owes money): U.S. BANK NATIONAL ASSOCIATION, VENZON WIRELESS WEST		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim.	
Name and address where notices should be sent: Verizon Wireless PO Box 3397 Bloomington, IL 61702 Telephone number: 800-555-8879		Court Claim Number: _____ (If known)	
Name and address where payment should be sent (if different from above):  Telephone number:		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach a copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.	
1. Amount of Claim as of Date Case Filed: \$ 58,038.60		5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount.	
If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4.			
If all or part of your claim is entitled to priority, complete item 5.			
<input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges.			
2. Basis for Claim: Services Performed (See instruction #2 on reverse side.)		Specify the priority of the claim.	
3. Last four digits of any number by which creditor identifies debtor: 3316		<input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B)	
3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		<input type="checkbox"/> Wages, salaries, or commissions (up to \$10,950*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier – 11 U.S.C. §507 (a)(4).	
4. Secured Claim (See instruction #4 on reverse side.)		<input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. §507 (a)(5).	
Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information.			
Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe:		<input type="checkbox"/> Up to \$2,425* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. §507 (a)(7).	
Value of Property: \$ _____ Annual Interest Rate _____ %		<input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. §507 (a)(8).	
Amount of arrearage and other charges as of time case filed included in secured claim,			
if any: \$ _____ Basis for perfection: _____		<input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. §507 (a) _____	
Amount of Secured Claim: \$ _____		Amount entitled to priority: \$ _____	
6. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim.			
7. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.)			
DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.			
If the documents are not available, please explain:			
Date: 7/23/2009	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.		
 /s/ Teri Fringer			FOR COURT USE ONLY

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

\*Amounts are subject to adjustment on  
4/1/10 and every 3 years thereafter  
with respect to cases commenced on or  
after the date of adjustment.

1R130-1 12:02:26 RECOVERY MANAGEMENT SYSTEM V0BAKANW 07/23/09  
 ACTIVE SWRG View Account R50  
 Acct...: 3316 **OVER 100 OTHER DEBTS** Birthdate....:  
 Tax #...: \*\*\*\*\*0000 Status.....: 60B  
 Name...: RHODES HOMES INCORPO Loan Type....: 0011  
 Name 2.: Coll.Fee  
 Address: 4730 S FORT APACHE RD STE 300 Officer.....: VN0011  
 Address: Recoverer....: HBAG  
 City...: LAS VEGAS State: NV Interest %....: .00  
 Ph(Ho): 9999999999 Zip..: 89147 Received....: 11/18/02  
 Ph(Off): . County....: Assigned....: 05/04/09  
 Contact Frequency: 000 / Payment Frequency: 000 / Coll.Fee %....: .00  
 Comaker: \*\*NONE\*\* Date Opened..: 08/24/00  
 Charge-Off Amt...: 8,038.60 Judgment Last Contact.:  
 Recovered Princ...: 0.00 0.00 Next Contact.:  
 Net Charge-Off...: 8,038.60 0.00 Last Payment.: 02/29/08  
 Associated Costs.: 0.00 0.00 Payment Due...:  
 Recovered Costs...: 0.00 0.00 Judgment Date:  
 Accrued Interest.: 0.00 0.00 Dead Transfer:  
 Recovered Int....: 0.00 0.00 Payment Amt..: 0.00  
 Account Balance...: 8,038.60 0.00 Past Due Amt.: 0.00  
 PF Keys: 3=Prev Daily Int Amt: 0.00

# EXHIBIT B

LARSON & STEPHENS  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
Tel: (702) 382-1170 Fax: (702) 382-1169



LAW OFFICES  
LIMITED LIABILITY PARTNERSHIP

SAN FRANCISCO, CA  
LOS ANGELES, CA  
WILMINGTON, DE  
NEW YORK, NY

150 CALIFORNIA STREET  
15th FLOOR  
SAN FRANCISCO  
CALIFORNIA 94111-4500

TELEPHONE: 415/263 7000  
FACSIMILE: 415/263 7010

LOS ANGELES  
10100 SANTA MONICA BLVD.  
11th FLOOR  
LOS ANGELES  
CALIFORNIA 90067-4100  
TELEPHONE: 310/277 6910  
FACSIMILE: 310/201 0760

DELAWARE  
919 NORTH MARKET STREET  
17th FLOOR  
P.O. BOX 8705  
WILMINGTON  
DELAWARE 19899-8705  
TELEPHONE: 302/652 4100  
FACSIMILE: 302/652 4400

NEW YORK  
788 THIRD AVENUE  
36th FLOOR  
NEW YORK  
NEW YORK 10017-2024  
TELEPHONE: 212/561 7700  
FACSIMILE: 212/561 7777

September 16, 2009

**VIA U.S. FIRST CLASS MAIL**

Evelia Delayo  
1044 Via Canale Drive  
Henderson, NV 89011

**Re: The Rhodes Companies, et al.  
Chapter 11 Case No. 09-14818  
(Jointly Administered)**

Dear Ms. Delayo:

This firm represents The Rhodes Companies, LLC (the "Debtor") in its Chapter 11 bankruptcy filed in the United States Bankruptcy Court for the District of Nevada (Case No. 09-14818 LBR). You filed a proof of claim on your behalf, designated as proof of claim number 37 in the secured amount of \$3,000.00 in the Debtor's bankruptcy case.

Your claim appears to be for service repair. The Debtor does not have any record of any customer service request by you for the service identified in your claim. Furthermore, the warranty on any such repair has long since passed. Based upon the Debtor's records, and the lack of documentation provided in support of your claim, it appears that there is no legal obligation on behalf of the Debtor to honor this claim. Therefore we respectfully request that you withdraw your claim. We do encourage you, however, to contact the customer service center about service repair.

Please withdraw your claim by signing and returning the enclosed Notice of Withdrawal of Claim by no later than October 9, 2009 so that we may avoid having to object to your claim in the Bankruptcy Court. Thank you.

Very truly yours,

/s/  
Patricia J. Jeffries

PJJ  
Enclosure  
cc: Michael A. Matteo

# EXHIBIT C

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LARSON & STEPHENS  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
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LAW OFFICES  
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WILMINGTON, DE  
NEW YORK, NY

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15th FLOOR  
SAN FRANCISCO  
CALIFORNIA 94111-4500

TELEPHONE: 415/263 7000  
FACSIMILE: 415/263 7010

September 17, 2009

**VIA U.S. FIRST CLASS MAIL**

HSBC Bank Nevada, N.A.  
eCast Settlement Corporation  
c/o Bass & Associates, P.C.  
3936 E. Ft. Lowell Rd., Suite 200  
Tucson, AZ 85712

**Re: The Rhodes Companies, et al.  
Chapter 11 Case No. 09-14814  
(Jointly Administered)**

To Whom it May Concern:

This firm represents Tuscany Golf Country Club, LLC (the "Debtor") in its Chapter 11 bankruptcy filed in the United States Bankruptcy Court for the District of Nevada (Case No. 09-14884 LBR). A proof of claim was filed by you on behalf of HSBC Bank Nevada, N.A. (Officemax Comm), designated as proof of claim number 8 in the amount of \$291.52, referencing account number ending in 1200, in the Debtor's bankruptcy case.

LOS ANGELES  
10100 SANTA MONICA BLVD.  
11th FLOOR  
LOS ANGELES  
CALIFORNIA 90067-4100  
TELEPHONE: 310/277 6910  
FACSIMILE: 310/201 0760

DELAWARE  
919 NORTH MARKET STREET  
17th FLOOR  
P.O. BOX 8705  
WILMINGTON  
DELAWARE 19899-8705  
TELEPHONE: 302/652 4100  
FACSIMILE: 302/652 4400

NEW YORK  
788 THIRD AVENUE  
36th FLOOR  
NEW YORK  
NEW YORK 10017-2024  
TELEPHONE: 212/561 7700  
FACSIMILE: 212/561 7777

We are unable to locate any such account with HSBC Bank or Officemax Comm based on the information provided with your proof of claim. Further, our records do not indicate that we hold any accounts with HSBC Bank or Officemax Comm.

Therefore, we request that you provide additional information, including, but not limited to, the complete name, billing address and account number and other information that will help us identify this account. Thank you.

Very truly yours,

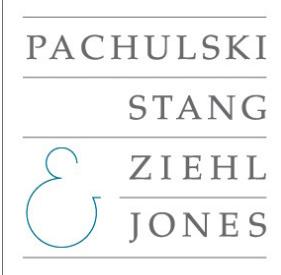
/s/  
Patricia J. Jeffries

PJJ  
Enclosure  
cc: Michael A. Matteo

# EXHIBIT D

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LARSON & STEPHENS  
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Las Vegas, Nevada 89101  
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September 17, 2009

LAW OFFICES  
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WILMINGTON, DE  
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36th FLOOR  
NEW YORK  
NEW YORK 10017-2024  
TELEPHONE: 212/561 7700  
FACSIMILE: 212/561 7777

**VIA U.S. FIRST CLASS MAIL**

Recovery Management Systems Corporation  
For GE Money Bank  
dba LESCO  
Attn: Ramesh Singh  
25 SE 2<sup>nd</sup> Ave., Ste 1120  
Miami, FL 33131

**Re: The Rhodes Companies, et al.  
Chapter 11 Case No. 09-14814  
(Jointly Administered)**

Dear Ramesh:

This firm represents Tuscany Golf Country Club, LLC (the "Debtor") in its Chapter 11 bankruptcy filed in the United States Bankruptcy Court for the District of Nevada (Case No. 09-14884 LBR). A proof of claim was filed by you on behalf of GE Money Bank, designated as proof of claim number 1 in the amount of \$32,621.67, referencing account number ending in 1973, in the Debtor's bankruptcy case.

We are unable to locate any such account with GE Money Bank based on the information provided with your proof of claim. Further, our records do not indicate that we hold any accounts with GE Money Bank.

Therefore, we request that you provide additional information, including, but not limited to, the complete name, billing address and account number and other information that will help us identify this account. Thank you.

Very truly yours,

/s/  
Patricia J. Jeffries

PJJ  
Enclosure  
cc: Michael A. Matteo

# EXHIBIT E

LARSON & STEPHENS  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
Tel: (702) 382-1170 Fax: (702) 382-1169



LAW OFFICES  
LIMITED LIABILITY PARTNERSHIP

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WILMINGTON, DE  
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NEW YORK  
NEW YORK 10017-2024  
TELEPHONE: 212/561 7700  
FACSIMILE: 212/561 7777

September 17, 2009

**VIA U.S. FIRST CLASS MAIL**

Verizon Wireless  
Bankruptcy Administrator  
PO Box 3397  
Bloomington, IL 61702

**Re: The Rhodes Companies, et al.  
Chapter 11 Case No. 09-14814  
(Jointly Administered)**

Dear Bankruptcy Administrator:

This firm represents The Rhodes Companies, LLC (the “Debtor”) in its Chapter 11 bankruptcy filed in the United States Bankruptcy Court for the District of Nevada (Case No. 09-14814 LBR). A proof of claim was filed by you on behalf of Verizon Wireless designated as proof of claim number 35 in the amount of \$8,038.60, in the Debtor’s bankruptcy case.

We are unable to locate any such account with Verizon Wireless based on the information provided with your proof of claim.

Therefore, we request that you provide additional information, including, but not limited to, the complete name, billing address and account number and other information that will help us identify this account. Thank you.

Very truly yours,

/s/  
Patricia J. Jeffries

PJJ  
Enclosure  
cc: Michael A. Matteo

# EXHIBIT F

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LARSON & STEPHENS  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
Tel: (702) 382-1170 Fax: (702) 382-1169

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA

In re:

THE RHODES COMPANIES, LLC, aka  
"Rhodes Homes," et al.<sup>1</sup>

Debtors.

Case No.: BK-S-09-14814-LBR  
(Jointly Administered)

Chapter 11

Affects:

All Debtors  
 Affects the following Debtor(s):

The Rhodes Companies, LLC 09-14814  
LBR; Tuscany Golf Country Club, LLC  
09-14884

Hearing Date: November 16, 2009

Hearing Time: 9:30 a.m.

Courtroom 1

<sup>1</sup> The Debtors in these cases, along with their case numbers are: Heritage Land Company, LLC (Case No. 09-14778); The Rhodes Companies, LLC (Case No. 09-14814); Tribes Holdings, LLC (Case No. 09-14817); Apache Framing, LLC (Case No. 09-14818); Geronimo Plumbing LLC (Case No. 09-14820); Gung-Ho Concrete LLC (Case No. 09-14822); Bravo, Inc. (Case No. 09-14825); Elkhorn Partners, A Nevada Limited Partnership (Case No. 09-14828); Six Feathers Holdings, LLC (Case No. 09-14833); Elkhorn Investments, Inc. (Case No. 09-14837); Jarupa, LLC (Case No. 09-14839); Rhodes Realty, Inc. (Case No. 09-14841); C & J Holdings, Inc. (Case No. 09-14843); Rhodes Ranch General Partnership (Case No. 09-14844); Rhodes Design and Development Corporation (Case No. 09-14846); Parcel 20, LLC (Case No. 09-14848); Tuscany Acquisitions IV, LLC (Case No. 09-14849); Tuscany Acquisitions III, LLC (Case No. 09-14850); Tuscany Acquisitions II, LLC (Case No. 09-14852); Tuscany Acquisitions, LLC (Case No. 09-14853); Rhodes Ranch Golf Country Club, LLC (Case No. 09-14854); Overflow, LP (Case No. 09-14856); Wallboard, LP (Case No. 09-14858); Jackknife, LP (Case No. 09-14860); Batcave, LP (Case No. 09-14861); Chalkline, LP (Case No. 09-14862); Glynda, LP (Case No. 09-14865); Tick, LP (Case No. 09-14866); Rhodes Arizona Properties, LLC (Case No. 09-14868); Rhodes Homes Arizona, L.L.C. (Case No. 09-14882); Tuscany Golf Country Club, LLC (Case No. 09-14884); and Pinnacle Grading, LLC (Case No. 09-14887).

**ORDER SUSTAINING DEBTORS' THIRD OMNIBUS OBJECTION TO  
CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY CODE  
AND BANKRUPTCY RULES 3003 AND 3007 [INSUFFICIENT  
DOCUMENTATION CLAIMS] DOCKET NO. ]**

Upon consideration of the *Debtors' Third Omnibus Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code and Bankruptcy Rules 3003 and 3007 [Insufficient Documentation Claims]* [Docket No. \_\_\_\_] (the “Third Omnibus Objection”),<sup>2</sup> filed by above-captioned debtors and debtors in possession (collectively, the “Debtors”), requesting that the Court enter an order disallowing and expunging in full the Insufficient Documentation Claims; and the Court having jurisdiction to consider the Third Omnibus Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having reviewed the Third Omnibus Objection; the Court hereby finds and determines that, pursuant to Rule 3007 of the Federal Rules of Bankruptcy Procedure, due and proper notice has been provided to the holders of the Insufficient Documentation Claims and all other parties entitled to notice; and no other or further notice is necessary; and the relief requested in the Third Omnibus Objection is in the best interests of the Debtors, their estates and creditors; and that the legal and factual bases set forth in the Third Omnibus Objection establishes just cause for the relief requested therein; therefore

1. The Third Omnibus Objection is granted.
2. The following claims are disallowed in their entirety:
  - Claim No. 37, filed by Evelia Delayo in Case No. 09-14814 against The Rhodes Companies, LLC, in the amount of \$3,000;
  - Claim No. 8, filed by HSBC Bank Nevada, N.A. in Case No. 09-14884 against Tuscany Golf Country Club, LLC, in the amount of \$291.52;
  - Claim No. 10, filed by Recovery Management Systems Corporation in

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Second Omnibus Objection.

1 Case No. 09-14884 against Tuscany Golf Country Club, LLC, in the  
2 amount of \$32,621.67; and

3 • Claim No. 35, filed by Verizon Wireless in Case No. 09-14814 against  
4 The Rhodes Companies, LLC, in the amount of \$8,038.60.

5 3. This Court shall retain jurisdiction to hear and determine all matters arising from  
6 the implementation of this Order.

7 APPROVED/DISAPPROVED:

8 DATED this \_\_\_\_ day of November, 2009.

9 By: \_\_\_\_\_  
10 UNITED STATES TRUSTEE  
11 August B. Landis  
12 Office of the United States Trustee  
300 Las Vegas Blvd. S., Ste. 4300  
Las Vegas, NV 89101

13 Submitted by:  
14 DATED this 16<sup>th</sup> day of November, 2009.

15 By: /s/ Zachariah Larson  
16 LARSON & STEPHENS  
17 Zachariah Larson, Esq. (NV Bar No 7787)  
18 Kyle O. Stephens, Esq. (NV Bar No. 7928)  
810 S. Casino Center Blvd., Ste. 104  
19 Las Vegas, NV 89101  
(702) 382-1170 (Telephone)  
(702) 382-1169  
zlarson@lslawnv.com  
20 Attorneys for Debtors

LARSON & STEPHENS  
810 S. Casino Center Blvd., Suite 104  
Las Vegas, Nevada 89101  
Tel: (702) 382-1170 Fax: (702) 382-1169

## LR 9021 Certification

In accordance with LR 9021, counsel submitting this document certifies as follows (check one):

\_\_\_\_ The court has waived the requirement of approval under LR 9021.

\_\_\_\_ No parties appeared or filed written objections, and there is no trustee appointed in the case.

I have delivered a copy of this proposed order to all counsel who appeared at the hearing, any unrepresented parties who appeared at the hearing, and any trustee appointed in this case, and each has approved or disapproved the order, or failed to respond, as indicated below.

Submitted by:  
DATED this 16th day of November, 2009.

By: /s/ Zachariah Larson  
LARSON & STEPHENS  
Zachariah Larson, Esq. (NV Bar No. 111-100)  
Kyle O. Stephens, Esq. (NV Bar No. 111-101)  
810 S. Casino Center Blvd., Ste. 100  
Las Vegas, NV 89101  
(702) 382-1170 (Telephone)  
(702) 382-1169  
zlarson@lslawnv.com  
Attorneys for Debtors

**LARSON & STEPHENS**  
**310 S. Casino Center Blvd., Suite 104**  
**Las Vegas, Nevada 89101**  
Tel: (702) 382-1170 Fax: (702) 382-1169